



Poca Blending, LLC

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October 18, 2010

Mr. Robert Staves (3EC10)
Environmental Science Center
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103

RE: Request for Information – Poca Blending, LLC

In response to your letter dated September 17, 2010 and received September 21, Poca Blending, LLC provides the attached responses. Also enclosed are two CDs with relevant documents. One CD contains confidential business information, and is so marked.

The responses to your questions have been prepared by Bob Reynolds, a consultant that has been helping us in our compliance efforts. He is familiar with our processes, procedures and products. I have reviewed and approved those responses.

If there are any questions or problems concerning this submission, please feel free to contact me at the above number.

Sincerely,

Ex. 4 - CBI

Plant Manager

- 1) Poca Blending has not and does not produce hazardous waste as part of its operation. Poca Blending does not manufacture chemicals; it conducts a custom blending operation. It does no chemical reactions, except pH adjustments; therefore, there are no process waste streams. Poca Blending has designed its operation to minimize waste generation by reusing virtually all hazardous chemicals and most non-hazardous chemicals.

Only once, has Poca Blending generated a hazardous waste. An obsolete raw material, anhydrous aluminum chloride, was disposed of in July 2003. The disposal was handled by Vopak – a registered hazardous waste disposal facility. See “Answer 1 – Vopak”.

Poca Blending minimizes its waste by collecting drips and hose drainage into buckets and emptying the buckets back into the appropriate raw material or finished product storage container. Process errors that occur are reformulated and rebled into finished product. Finished product specifications allow for significant variation.

Raw material storage tanks, for hazardous chemicals, are in dedicated service. These include caustic soda solutions (both 50% and 20%), acetic acid (various concentrations) and EP-202. During the early part of May, 2010, an environmental contractor conducted a rare cleaning of the 50% caustic soda tank. It was accomplished by allowing both the 50% and 20% caustic tanks to go empty. Rinse water from the 50% caustic tank was pumped to the 20% caustic tank for use as dilution water. Necessary maintenance was conducted on the 50% caustic tank. Then 50% caustic from a tank car was mixed with the dilution water from the tank cleaning to make 20% caustic – no hazardous waste was generated.

Response by: Bob Reynolds

Persons consulted: **Ex. 4 - CBI** Travis Bentley

Documents consulted: Waste manifests

- 2) Poca Blending generates very little waste. The only hazardous waste generated at Poca Blending was an obsolete raw material, anhydrous aluminum chloride. The disposal of that material was handled by Vopak – a registered hazardous waste disposal company. See “Answer 1 – Vopak”

Once, in 2004, there was a spill of acetic acid. Soil contaminated with the acetic acid was disposed of at the Sycamore landfill after receiving a minor permit modification from WV DEP. See "Answer 2 – Sycamore"

Most non-hazardous waste is sent to Enviro Tank Clean, Inc., Belpre, OH, for drying and disposal. This waste often has a significant amount of water. These wastes are often accumulated until there is a full truckload. See "Answer 2 – Enviro Tank"

Non-hazardous waste materials with little or no water are sent to/sold to Crystal Clean for use as fuel. See "Answer 2 – Crystal Clean"

Normal solid waste, including packaging materials, office trash, lunchroom trash, floor sweepings, etc. is currently being disposed of by Allied Waste.

Poca Blending does not have an industrial sewer. Sanitary waste goes to the Nitro POTW.

Response by: Bob Reynolds

Persons consulted: **Ex. 4 - CBI** Travis Bentley

Documents consulted: Waste manifests, Crystal Clean invoices

- 3) Poca Blending stores non-hazardous waste materials in tanks, 275-gal. tote bins and drums. There is no established accumulation area for non-hazardous waste.

At no time are hazardous wastes stored.

Response by: Bob Reynolds

Persons consulted: **Ex. 4 - CBI** Travis Bentley

Documents consulted: None

- 4) Storage of non-hazardous waste material usually exceeds 90 days. No hazardous waste is stored.

Response by: Bob Reynolds

Persons consulted: **Ex. 4 - CBI** Travis Bentley

Documents consulted: None

- 5) No. There is no hazardous waste being generated at the plant.

Response by: Bob Reynolds

Persons consulted: None

Documents consulted: 40 CFR 261.4 (not included with this submission)

- 6) Poca Blending does not treat waste materials on site. Because waste facilities often require a waste profile and analysis, wastes are occasionally blended, so a single composite sample can be analyzed prior to disposal. See "Answer 6 – Waste Analysis"

Response by: Bob Reynolds

Persons consulted: **Ex. 4 - CBI** Travis Bentley

Documents consulted: Waste analysis

- 7) Yes – see Answer 1 – Vopak

Response by: Bob Reynolds

Persons consulted: None

Documents consulted: Vopak hazardous waste manifest

- 8) The response to this question is Confidential Business Information. Only those chemicals listed in the Tier 2 report are not CBI. Redacted versions of the spreadsheets are included in the CD as Answer 8. The second CD contains the CBI, which includes a pdf file of a computer-generated listing of all Poca Blending's chemical purchases for the 3 years ending June 30, 2010 ("Answer 8 - Poca Purchases"). The second spreadsheet provides totals for each chemical ("Answer 8 Poca Purchases - Totals"). The third (Answer 8 – Poca Purchases – Annual") is the response to this question. Annual totals are for July 1 – June 30 of each year.

Response by: Bob Reynolds

Persons consulted: **Ex. 4 - CBI** Travis Bentley

Documents consulted: Computer listing

- 9) Any Poca Blending employee who discovers a spill or leak of a significant amount of oil or other material is required to:
- Stop the source of the spill or leak, if safe to do so
 - Dike the area of the spill with absorbent, if necessary to prevent the spill from spreading
 - Notify the Plant Manager (or designate) for further instructions

Significant spills are not routine, therefore, there is no standard procedure for handling them. The Plant Manager, in coordination with the Regulatory and Environmental Consultant:

- Make a preliminary evaluation of the seriousness of the event
- Determine if a production shutdown is required and so order if deemed necessary
- Determine if the plant must be evacuated, and so order if necessary
- Summon the necessary personnel to mitigate the situation if safe to do so
- Summon outside emergency services if required
- Notify the WV DEP and/or National Response Center if required
- Determine if the spilled material is reusable
- Determine if the spilled material is a hazardous waste
- Determine the disposition of any waste material

Minor spills (defined at Poca as 1 gallon or less) of non-hazardous materials, are to be cleaned using absorbent materials. This material is disposed of with the normal floor sweepings and trash.

Response by: Bob Reynolds

Persons consulted: **Ex. 4 - CBI** Travis Bentley

Documents consulted: Poca Pollution Prevention Plan, HazCom Program

10) Training documents for plant operators are included as "Answer 10 – Training Documents". Note that some of the people that attended HazCom training were truck drivers. Some of the employees are no longer with the company.

The Plant Manager – **Ex. 4 - CBI** – received HAZWOPPER training at his previous employer, Flexsys, about ~6 years ago. Documentation is unavailable.

Bob Reynolds, our Regulatory and Environmental consultant has worked in the chemical industry for 40 years. In his previous position as Director – Regulatory Affairs for Sherex Chemical Company, he was certified as a Regulatory Compliance Manager by the National Association of Hazardous Waste Generators.

Response by: Bob Reynolds

Persons consulted: **Ex. 4 - CBI** Travis Bentley

Documents consulted: OSHA HazCom and Stormwater/Groundwater Protection Plan training documents

11) Yes, see Answer 9.

Response by: Bob Reynolds

Persons consulted: **Ex. 4 - CBI** Travis Bentley

Documents consulted: Stormwater/Groundwater Pollution Prevention Plan

- 12) No, Poca does not have an SPCC Plan. When Poca Blending started, S/D Engineers, Inc. did all the permitting and wrote the original Stormwater / Groundwater Pollution Prevention Plan as required by WV DEP. It has only recently come to our attention that an SPCC Plan is also required. Poca Blending has begun the process of developing an SPCC Plan.

Response by: Bob Reynolds

Persons consulted: **Ex. 4 - CBI**

Documents consulted: None

- 13) Poca Blending has no waste streams, except the sanitary sewer. This is considered a non-hazardous waste.

Other wastes that may be generated at Poca Blending are episodic (e.g. spill, process error, or tank cleaning). These have all been non-hazardous.

Response by: Bob Reynolds

Persons consulted: **Ex. 4 - CBI** Travis Bentley

- 14) The requested MSDS are included on the CD marked "Answer 14 MSDS"

Response by: Bob Reynolds

Persons consulted: None

Documents consulted: 2009 Tier 2 report

- 15) The inspection occurred on February 1, 2010. The description provided in item 15 could fit a number of locations in the plant. Poca Blending cannot identify the specific referenced pipes. Generally, drip buckets are required to be used during any operation (e.g. loading, unloading, sampling, etc.) that may result in minor spills or leaks. The contents of these buckets are regularly returned to production. Since some operations occur with some degree of regularity, buckets are left, uncleaned, in the vicinity of use.

See also, response #1

Response by: Bob Reynolds

Persons consulted: Ex. 4 - CBI Travis Bentley

Documents consulted:

16) Annual DMRs for the last 5 years are included as "Answer 16 – DMRs"

Response by: Bob Reynolds

Persons consulted: None

Documents consulted: Annual DMR

17) There are currently eight (8) full-time employees at Poca Blending.

Response by: Bob Reynolds

Persons consulted: Ex. 4 - CBI

Documents consulted: None